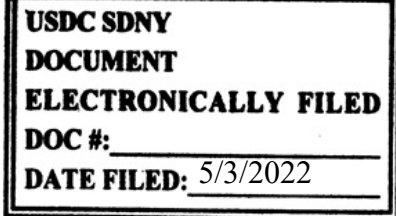


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE LIFETRADE LITIGATION:

This Document Relates To All Actions



MASTER FILE

1:17-CV-02987 (JPO)(KHP)

**STIPULATION AND SUPPLEMENTAL PROTECTIVE ORDER**

WHEREAS, counsel for Plaintiffs have applied to the Comptroller of the Currency (hereinafter "Comptroller") pursuant to 12 C.F.R. part 4, Subpart C, for permission to have made available, in connection with the captioned action, certain records; and

WHEREAS, following consideration by the Comptroller of the application of the above-described party, the Comptroller has determined that the particular circumstances of the captioned action warrant making certain possibly relevant records as denoted in appendix "A" to this Stipulation available to the parties in this action, provided that appropriate protection of their confidentiality can be secured;

THEREFORE, it is hereby stipulated by and between the parties hereto, through their respective attorneys that they will be bound by the following Supplemental Protective Order which may be entered by the Court without further notice. The Supplemental Protective Order supplements the Protective Order entered in this action on December 2, 2019 (Dkt. 223).

Dated this 3rd day of May, 2022.

/s/ Steven Phillips

Steven Phillips  
Diane Paolicelli  
PHILLIPS & PAOLICELLI, LLP  
747 Third Avenue, 6th Floor

/s/ Kelly A. Carrero

Kelly A. Carrero  
JONES DAY  
250 Vesey Street  
New York, NY 10281

New York, NY 10017  
(646) 581-9226

*Attorneys for Plaintiffs*

/s/ Jason S. Bell

Jason S. Bell  
John G. McCarthy  
SMITH, GAMBRELL & RUSSELL, LLP  
Promenade, Suite 3100  
1105 West Peachtree Street N.E.  
Atlanta, GA 30309  
(404) 815-3619

*Attorneys for Defendant Robert A. Ruppenthal*

(212) 326-3604

*Attorneys for the Wells Fargo Defendants*

/s/ Tammy L. Roy

Tammy L. Roy  
CAHILL GORDON & REINDEL LLP  
32 Old Slip  
New York, NY 10005  
(212) 701-3720

*Attorneys for Defendant S&P Global Inc.*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE LIFETRADE LITIGATION:

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1:17-CV-02987 (JPO)(KHP)

**SUPPLEMENTAL PROTECTIVE ORDER**

WHEREAS, counsel for Plaintiffs have applied to the Comptroller of the Currency (hereinafter Comptroller”) pursuant to 12 C.F.R. part 4, Subpart C, for permission to have made available, in connection with the captioned action, certain records; and

WHEREAS, following consideration by the Comptroller of the application of the above described party, the Comptroller has determined that the particular circumstances of the captioned action warrant making certain possibly relevant records available to the parties in this action, provided that appropriate protection of their confidentiality can be secured;

NOW, THEREFORE, IT IS ORDERED THAT:

1. The records, as denoted in appendix “A” to the Stipulation for this Protective Order, upon being released for use by the Comptroller, shall be disclosed only to the parties to this action, their counsel, and the Court.

2. The parties to this action and their counsel shall keep such records and any information contained in such records confidential and shall in no way divulge the same to any person or entity, except to such experts, consultants and non-party witnesses to whom the records and their contents shall be disclosed, solely for the purpose of properly preparing for and trying the action.

3. No person to whom information and records covered by this Order are disclosed shall make any copies or otherwise use such information or records or their contents for any purpose whatsoever, except in connection with this action.

4. Any party or other person who wishes to use the information or records or their contents in any other action shall make a separate application to the Comptroller pursuant to 12 C.F.R. part 4, Subpart C.

5. Should any records covered by this Order be filed with the Court or utilized as exhibits at depositions in the captioned action, or should information or records or their contents covered by this Order be disclosed in the transcripts of depositions or the trial in the captioned action, such records, exhibits and transcripts shall be filed in sealed envelopes or other sealed containers marked with the title of this action, identifying each document and article therein and bearing a statement substantially in the following form:

CONFIDENTIAL

Pursuant to the Order of the Court dated \_\_\_\_\_ this envelope containing the above-identified papers filed by (the name of the party) is not to be opened nor the contents thereof displayed or revealed except to the parties to this action or their counsel or by further Order of the Court.

6. FOR JURY TRIAL: Any party offering any of the records into evidence shall offer only those pages, or portions thereof, that are relevant and material to the issues to be decided in the action and shall block out any portion of any page that contains information not relevant or material. Furthermore, the name of any person or entity contained on any page of the records who is not a party to this action, or whose name is not otherwise relevant or material to the action, shall be blocked out prior to the admission of such page into evidence. Any disagreement regarding

what portion of any page that should be blocked out in this manner shall be resolved by the Court in camera, and the Court shall decide its admissibility into evidence.

7. At the conclusion of this action, all parties shall certify to the Comptroller that the records covered by this Order have been destroyed. Furthermore, counsel for Plaintiffs, pursuant to 12 C.F.R. 4.39(c), shall retrieve any records covered by this Order that may have been filed with the Court.

Dated: May 3, 2022

SO ORDERED:



HON. KATHARINE H. PARKER  
UNITED STATES MAGISTRATE JUDGE

**APPENDIX A**

<b>No.</b>	<b>Document Type</b>	<b>Date</b>
1	PDF	12/10/2015
2	Email	12/10/2015
3	Email	12/10/2015
4	Email	12/10/2015
5	Email	12/10/2015
6	Email	12/11/2015
7	Email	12/14/2015
8	Email	12/16/2015
9	Email	4/8/2016
10	PDF	4/22/2016
11	PDF	4/22/2016
12	Email	4/22/2016
13	PowerPoint	5/5/2016
14	PDF	5/5/2016
15	PDF	5/5/2016
16	Email	5/9/2016
17	PDF	5/23/2016
18	Excel	5/25/2016
19	Word	6/13/2016
20	PDF	6/21/2016
21	PowerPoint	8/3/2016
22	PDF	8/3/2016
23	PowerPoint	8/4/2016
24	Email	8/5/2016
25	PDF	8/8/2016
26	PowerPoint	8/8/2016
27	PowerPoint	10/27/2016
28	PowerPoint	10/31/2016
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35	PowerPoint	2/3/2017
36	PDF	2/3/2017
37	Email	2/3/2017
38	PowerPoint	5/8/2017
39	PowerPoint	5/8/2017
40	PDF	5/8/2017
41	PowerPoint	5/9/2017
42	Email	5/9/2017

<b>No.</b>	<b>Document Type</b>	<b>Date</b>
43	PowerPoint	7/5/2017
44	PowerPoint	7/6/2017
45	PowerPoint	7/19/2017
46	PowerPoint	7/19/2017
47	PowerPoint	7/19/2017
48	Word	7/19/2017
49	PDF	7/20/2017
50	Word	7/20/2017
51	PDF	7/20/2017
52	Email	7/21/2017
53	Excel	7/25/2017
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58	PowerPoint	10/12/2017
59	PowerPoint	10/19/2017
60	PDF	11/3/2017
61	PDF	11/3/2017
62	PDF	11/3/2017
63	PDF	11/3/2017
64	Excel	2/15/2018
65	Excel	5/24/2018